



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**REGION 10**

1200 Sixth Avenue, Suite 900  
Seattle, Washington 98101-3140

**MAR - 8 2016**

OFFICE OF  
COMPLIANCE AND ENFORCEMENT

Reply to: OCE-101

**CERTIFIED MAIL – RETURN RECEIPT REQUESTED**

The Honorable Rebecca Casper  
Mayor of Idaho Falls  
308 Constitution Way  
P.O. Box 50220  
Idaho Falls, Idaho 83405

Re: Idaho Falls WWTP  
NPDES Permit Number ID-002126-1

Dear Mayor Casper:

On November 1, 2013, the U.S. Environmental Protection Agency (EPA) issued a National Pollutant Discharge Elimination System (NPDES) permit to the City of Idaho Falls, Idaho ("City") wastewater treatment facility ("Facility"), NPDES Permit Number ID-002126-1 ("Permit"). The Permit expires on October 31, 2017. The purpose of this letter is to notify the City of an area of concern EPA discovered after reviewing administrative files including the Discharge Monitoring Reports (DMRs) submitted by the City, and in response to the September 3, 2015 inspection of the Facility conducted by the Idaho Department of Environmental Quality (IDEQ) on behalf of the EPA. The purpose of this inspection was to determine the Facility's compliance with the requirements of the Clean Water Act (CWA) and the NPDES permit. I would like to express my appreciation for your staff's time and cooperation during the inspection.

On December 21, 2015, the NPDES Electronic Reporting Rule became effective. Permittees with a DMR requirement will have one year from this date to submit DMRs through NetDMR. Additional information is enclosed (Enclosure A).

**SEPTEMBER 2015 INSPECTION**

**AREA OF CONCERN**

Part I.B.1 of the Permit states that the permittee must limit and monitor discharges from outfall 001 as specified in Table 1, below. All figures represent maximum effluent limits unless otherwise indicated. The permittee must comply with the effluent limits in the tables at all times unless otherwise indicated, regardless of the frequency of monitoring or reporting required by other provisions of this permit.

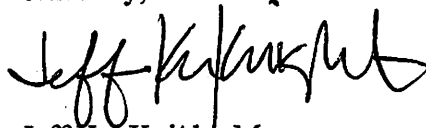
Part IV.E specifies that the permittee must at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the permittee to achieve compliance with the conditions of this permit. Proper operation and maintenance also includes adequate laboratory controls and appropriate quality assurance procedures.

At the time of the inspection, the inspector noted that the last recorded calibration of the flow meter was in June 2013. An improperly calibrated flow meter has the potential to produce incorrect readings and, subsequently, incorrect calculations that could lead to effluent violations.

Although our goal is to ensure NPDES facilities comply fully with their permits, the ultimate responsibility rests with the permittee. As such, I want to strongly encourage you to continue your efforts to maintain full knowledge of the Permit requirements, and other appropriate statutes, and to take appropriate measures to ensure compliance. Notwithstanding your response to this letter, EPA retains all rights to pursue enforcement actions to address these and any other violations.

I have enclosed a copy of the inspection report (Enclosure B). If you have any questions concerning this matter, please do not hesitate to contact Raymond Andrews of my staff at (206) 553-4252.

Sincerely,



Jeff KenKnight, Manager  
NPDES Compliance Unit

Enclosures

cc: Mr. Stephen Berry  
Idaho Department of Environmental Quality  
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Mr. David Anderson  
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